

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to 1:18-CV-05053-LAK.

MASTER DOCKET

Case No. 1:18-MD-02865-LAK

**NOTICE OF THE GOLDSTEIN LAW GROUP PC 401(K) PROFIT SHARING  
PLAN'S AND SHELDON GOLDSTEIN'S  
MOTION TO DISMISS COUNTERCLAIM**

**PLEASE TAKE NOTICE** that, upon the accompanying March 30, 2020 Memorandum of Law and March 30, 2020 Declaration of Kari Parks, with all exhibits thereto, Defendants-Third-Party Plaintiffs-Third-Party Counterclaim Defendants The Goldstein Law Group PC 401(K) Profit Sharing Plan and Sheldon Goldstein (together, the **"Goldstein Parties"**), by their undersigned attorneys, will move the Court before the Honorable Lewis A. Kaplan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Third-Party Defendant-Third-Party Counterclaim Plaintiff ED&F Man Capital Markets, Ltd's Counterclaim against the Goldstein Parties with prejudice, and for such other and further relief as the Court deems just and proper.

The Goldstein Parties respectfully request that the Court hold oral argument on this Motion.

Dated: March 30, 2020  
New York, New York

GUSRAE KAPLAN NUSBAUM PLLC

By: /s/ Martin H. Kaplan  
Martin H. Kaplan  
Kari Parks  
120 Wall Street  
New York, New York 10005  
Telephone: (212) 269-1400  
Fax: (212) 809-4147  
[mkaplan@gusraekaplan.com](mailto:mkaplan@gusraekaplan.com)  
[kparks@gusraekaplan.com](mailto:kparks@gusraekaplan.com)

*Counsel for Third-Party Counterclaim  
Defendants The Goldstein Law Group PC  
401(k) Profit Sharing Plan and  
Sheldon Goldstein*